

MARQUIS AURBACH

10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

Marquis Aurbach

Christian T. Balducci, Esq.

Nevada Bar No. 12688

W. Reese Levins, Esq.

Nevada Bar No. 15951

10001 Park Run Drive

Las Vegas, Nevada 89145

Telephone: (702) 382-0711

Facsimile: (702) 382-5816

cbalducci@maclaw.com

rlevins@maclaw.com

Attorneys for Kenai Drilling Limited and Kenai Drilling Limited Employee Benefit Plan

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

KENAI DRILLING LIMITED, a Delaware
Corporation, and KENAI DRILLING
LIMITED EMPLOYEE BENEFIT PLAN,,

Plaintiff,

vs.

SUN LIFE ASSURANCE COMPANY OF
CANADA,

Defendant.

Case Number:

2:24-cv-01559-CDS-EJY

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFFS
KENAI DRILLING LIMITED AND
KENAI DRILLING LIMITED
EMPLOYEE BENEFIT PLAN
TO FILE A REPLY IN SUPPORT OF
PETITION TO COMPEL
ARBITRATION**

(FIRST REQUEST)

Pursuant to Local Rules IA 6-1 and IA 6-2, Plaintiffs Kenai Drilling Limited and Kenai Drilling Limited Employee Benefit Plan (“Plaintiffs”) and Defendant Sun Life Assurance Company of Canada (“Defendant”) (collectively “the Parties”) by and through their respective counsel of record, hereby stipulate and agree Plaintiffs shall have up to and including **October 7, 2024** to file a Reply in Support of Plaintiff’s Petition to Compel Arbitration. The present deadline for Plaintiffs to file their Reply is September 30, 2024, and no hearing has been set regarding Plaintiffs’ Petition to Compel Arbitration. This is the Parties’ first stipulation for extension of time for Plaintiff’s to file their Reply in Support of the Petition to Compel Arbitration.

In support of this Stipulation, the Parties state as follows:

1. Plaintiffs filed their Petition to Compel Arbitration in the Eighth Judicial District Court in and for Clark County, Nevada on July 24, 2024.

MARQUIS AURBACH

10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

2. Defendants filed a Petition for Removal of Action on Aug. 23, 2024 [ECF No. 1].

3. Defendants filed their Response to Petition to Compel Arbitration on September 16, 2024 [ECF No. 13].

4. Plaintiffs' Reply in Support of their Petition to Compel Arbitration is currently due September 30, 2024.

5. However, due to counsel for Plaintiffs' previously scheduled depositions, mediations, and competing deadlines in other matters, Plaintiffs' counsel requires additional time to prepare and file its Reply in Support of the Petition to Compel Arbitration.

6. On September 26, 2024, counsel for Defendant consented to the relief requested.

7. This Stipulation is filed before the Reply in Support of the Petition to Compel Arbitration is due and is good faith and not for purpose of unwarranted delay.

Dated this 30th day of September, 2024.


Dated this 30th day of September, 2024.

By/s/ W. Reese Levins
Christian T. Balducci, Esq.
Nevada Bar No. 12688
W. Reese Levins, Esq.
Nevada Bar No. 15951
MARQUIS AURBACH
10001 Park Run Drive
Las Vegas, Nevada 89145
Attorneys for Plaintiffs

By/s/ Lance v. Clack
Bill E. Davidoff (*Pro Hac Vice*)
Lance V. Clack (*Pro Hac Vice*)
FIGARI + DAVENPORT, LLP
901 Main Street, Suite 3400
Dallas, Texas 75202

Ryan T. Gormley
Nevada Bar No. 13494
WEINBERG, WHEELER, HUDGINS,
GUNN & DIAL, LLC
6385 South Rainbow Blvd., Suite 400
Las Vegas, Nevada 89118
Attorneys for Defendant

IT IS SO ORDERED


ELAYNA J. YOUCHAK
U.S. MAGISTRATE JUDGE
Dated: September 30, 2024